



September 2, 2016

Barbara Richardson
Commissioner
Nevada Division of Insurance
1818 E College Parkway, Ste 103
Carson City, NV 89706

Re: File R119-16
VIA Electronic email

Dear Commissioner Richardson:

We respectfully submit the following comments to the regulation R119-16 related to dental claim forms. While we understand and agree that certain forms are acceptable for claims processing, we believe the current process used to receive dental claims containing all the information be allowed to continue no matter the form used. This current process is appropriate and is not causing delays in claims processing.

By not allowing additional claims forms to be used (that still contain all of the needed information) the regulation would cause undue provider abrasion, delay claim processing times and would not be considered advantageous to our members. From our business perspective, this would require system build outs, additional workflows, new processes, increased phone calls and processing times. Therefore, we recommend the "and" be changed to "or". Please see (c) (1) below.

(c) For claims submitted using the American Dental Association's Code on Dental Procedures and Nomenclature or HCPCS Level II D Codes, the following forms: American Dental Association Form J430D, CMS 1500, and CMS 1450, HCPCS Level II D Codes or its successor forms.

- (1) Has been approved by the Commissioner of Insurance for the filing of a claim under a contract for health insurance; and or
- (2) Contains the information necessary to constitute a clean claim.

Thank you for your consideration.

Sincerely,

Tracey Woods
Senior Director, Government Relations